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Before the FEDERAL COMMUNICATIONS COMMISSION

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| In the Matter of                     | )                     |
|--------------------------------------|-----------------------|
|                                      | )                     |
| Amendment of Parts 2 and 15          | )                     |
| of the Commission's Rules to Permit  | ) ET Docket No. 94-32 |
| Use of Radio Frequencies Above 40GHz | )                     |
| for New Radio Applications           | ,<br>)                |

Washington, D.C. 20554

To: The Commission

## COMMENTS OF A. FRANK ADAMSON, Ph.D.

I am a licensed amateur radio operator (KD6PAL, General Class). My interests include both the voice and digital modes on HF, and VHF/UHF voice and packet communications, which necessitates the use of repeaters for transmission beyond line of sight and for public service networking. My involvement in public service leads me to be enthusiastic about the development of A.P.R.S. (Amateur Position Reporting System) programs on packet radio. Already networks on the East Coast and in the Middle West are providing storm warnings as well as geographical locations of equipment and personnel presented graphically on computer screens when assisting in emergencies. The interactive information is shared on all of the computer screens on the net and gives the net control visual comprehension of resources and position. The program includes the capacity for print out of further information by means of ASCII text if needed. Here on the West Coast we are developing such a system and several strategically located repeaters are in operation. While I do not at present have the equipment to do so. I hope in the near future to be joining those who are experimenting with satellite links so that A.P.R.S. networks nationwide will be realized. Already the beginnings of a world wide network are underway

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utilizing satellites. The 2 Mhz proposed for AMSAT / Satellite in the 2400 - 2402 Mhz range is not only too small but does not match existing band widths in other bands. This threatens to put the cap on future developments in Amateur Radio with negative implications for public service especially, but for its general purposes also.

My primary concern is for the effect that replacing the military and federal agencies as primary users on the 2390 - 2400 Mhz and 2402 - 2417 Mhz. Of course it would be just fine if you would simply designate Amateur Radio as the primary user. But if we are to share those precious frequencies, it is more important who that is to be with than choosing the right room mate in college.

I am sure you are aware of the increasing recognition of the value of supplemental Amateur Radio communication in times of fire, flood, earthquake, and civil unrest. Perhaps because of the number of such disasters recently, and also the growing ranks of Amateurs who are eager to serve their communities, the demand for spectrums to carry out those efforts will swell.

I am a member of the ARES, RACES group affiliated with the Amateur Radio Club of Santa Cruz. We work in close cooperation with Santa Cruz County governmental agencies, with Santa Cruz County Chapter of the American Red Cross, and network with Monterey and Santa Clara Counties in time of need. I also belong to the San Lorenzo Valley Emergency network which involves the mountainous area where I reside. Here the Valley Resource Center (which includes a branch of the Santa Cruz County Red Cross Unit), Forestry, Fire, and Sheriffs Department cooperate at every level with amateurs in

Chapter of the American Red Cross and I am often called to the scene of disasters to work with victims or other volunteers who are stressed by the events. As the Red Cross Headquarters in Santa Cruz is fortunate to have volunteer amateur operators I am able to communicate directly regarding needs as they arise, not all related to mental health but some times involving damage assessment, need for medical attention, for housing, food, supplies and more volunteers.

In summary. I am concerned that those sharing the 2390 - 2400 Mhz and 2402 - 2417 Mhz bands shall be compatible with amateur radio use, bearing in mind that in time of emergency we may need it all and for unspecified lengths of time.

Secondly, the 2 Mhz proposed for the AMSAT Satellite Service from 2400 - 2402 Mhz is not adequate to allow for growth in this very important segment of communication.

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Respectfully submitted.

By Arthur Frank Adamson, Ph